REMARKS/ARGUMENTS

The examiner rejected claims 1 – 20 under 35 U.S.C. 102 § (e) as being anticipated by *Lee et al.* (U.S. Patent No. 5,995,969). The rejection should be withdrawn for at least the following reasons.

Initially, it is respectfully submitted that the *Lee et al.* reference is not a 35 U.S.C. § 102 (e) reference. For the sake of expediting the examination procedure, Applicant will assume that Examiner intended to apply the *Lee et al.* reference as a 35 U.S.C. § 102 (b) reference. In any case, Applicant will explain why pending claims 1 – 20 are not anticipated by the *Lee et al.* reference.

To anticipate a claim under § 102(b), a single prior art reference must identically disclose each and every claim element. See Lindeman Machinenfabrik v. American Hoist and Derrick, 730 F.2d 1452, 1458 (Fed. Cir. 1984). If any claimed element is absent from a prior art reference, it cannot anticipate the claim. See Rowe v. Dror, 112 F.3d 473, 478 (Fed. Cir. 1997). Anticipation requires the presence in a single prior art reference disclosure of each and every element of the claim invention, arranged as in the claim. Lindeman, 703 F.2d 1458 (Emphasis added).

The present invention as set forth in independent claims 1, 6, 11 and 16 relates to the generation of a process step on the basis of the definition in the metadata definition storage and to then execute this process step by using the application data by means of the first function specified in the metadata definition storage. Specifically, independent claim 1 recites a computer system for automatically generating a process step, which computer system includes, *inter alia*, "a process generator for generating the process step on the basis of the definition in the meta data definition storage," and "a runtime environment for accessing the application data on the basis of the data logic and executing the process step using the application data by means of the first function specified in the meta data definition storage." Independent claims 6, 11 and 16 recite

limitations similar to the above-recited limitations of claim 1.

In contrast to the subject matter of claims 1, 6, 11 and 16, the *Lee et al.* reference does not disclose the <u>automatic</u> generation of a process step; instead, the *Lee et al.* reference focuses on facilitating an information exchange between corresponding software development tools which then, on their side, generate the respective process step. As indicated in column 2, lines 39 - 46 of the *Lee et al.* reference, it is an object of the invention described in the *Lee et al.* reference "to provide a meta model system of an integrated CASE repository and integrated supporting method, which constructs a repository for commonly storing, sharing and managing information generated by CASE tools of DFD and SC of process methodologies, to realize a standardization and full automation of software development process and sharing of information between tools." Furthermore, as indicated in column 2, lines 49 - 57 of the *Lee et al.* reference, "[t]he repository is an essential component for consistently storing, sharing and managing information generated by DFD and SC tools of diagramming tools. The repository automatically integratedly manages information of analysis and design for structured techniques supporting the software development process, to provide standardization and full automation of the software development process and sharing of information between the tools."

In other words, the *Lee et al.* reference relates to a meta model system of a CASE repository, which is adapted to facilitate a software development process by facilitating a sharing of information between the individual tools used for designing the software. However, it is respectfully submitted that the *Lee et al.* reference fails to disclose at least a process generator for generating a process step on the basis of definition in the metadata definition storage, as recited in independent claims 1, 6, 11 and 16. Furthermore, the *Lee et al.* reference also fails to disclose a corresponding runtime environment for accessing the application data on the basis of the data-logic and <u>executing the process step (generated in the step above) using the application data by means of the first function specified in the metadata definition storage</u>, as recited in independent claims 1, 6, 11 and 16. In other words, in contrast to the present invention, which relates to the generation of a process step on the basis of the definition in the metadata definition storage and to

then execute this process step by using the application data by means of the first function specified in the metadata definition storage, the *Lee et al.* reference does not disclose the <u>automatic</u> generation of a process step, but merely discloses facilitating an information exchange between corresponding software development tools which then, on their side, generate the respective process step.

In view of the foregoing, it is respectfully submitted that claims 1, 6, 11 and 16 are allowable over the *Lee et al.* reference. Similarly, claims 2-5, 7-10, 12-15 and 17 – 20 are allowable over the *Lee et al.* reference by virtue of these claims' dependence on allowable claim 1, 6, 11 or 16. Thus, it is respectfully submitted that the anticipation rejection of claims 1-20 should be withdrawn.

Applicant respectfully requests a timely issuance of a notice of allowance.

Respectfully submitted

KENYON & KENYON

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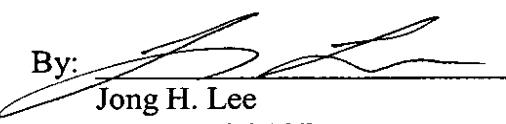
Jong H. Lee
Reg. No. 36,197
(212)908-6479
CUSTOMER NO. 26646